

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DUSTIN MORRISON,

Plaintiff,

v.

Civil Action File No.:

VETERANS MEDICAL
TRANSPORT, LLC, GEORGIA
MEDICAL RESPONSE, LLC,
MAHAMUD FARAH and
ABDILATIF KASSIM,

Defendants.

COMPLAINT

Plaintiff Dustin Morrison (“Mr. Morrison”) states his complaint against the above-named Defendants as follows.

1. This is a complaint for unpaid overtime in violation of the Fair Labor Standards Act (“FLSA”).
2. This Court has jurisdiction over Plaintiff’s claims, and venue is proper in this Court.
3. Defendant Veterans Medical Transport, LLC (“VMT”) is a Georgia Limited Liability Company that provides medical transport services in the Metro Atlanta area.

4. Defendant Georgia Medical Response, LLC (“GMR”) is a Georgia Limited Liability Company that provides medical transport services in the Metro Atlanta area.
5. During each of the three years preceding the filing of this complaint, VMT and GMR’s gross annual sales were greater than \$500,000.
6. Defendant Mahamud Farah (“Farah”) owns and operates VMT and actively manages the operations of the company.
7. Defendant Abdilatif Kassim (“Kassim”) owns and operates GMR and actively manages the operations of the company.
8. Mr. Morrison worked for VMT and GMR as an Emergency Medical Technician from April 2013 through May 2015.
9. As an Emergency Medical Technician, Mr. Morrison was responsible for providing medical transportation to clients of VMT and GMR. This included all aspects of picking up patients at their location and transporting them to their final destination.
10. At all times relevant to this complaint, Mr. Morrison worked jointly for VMT and GMR. For example, he wore the same company-provided uniforms and drove the same company-provided vehicles when servicing clients of VMT and GMR. Also, Mr. Morrison reported to the same

supervisors and managers for both VMT and GMR.

11. At all times relevant to this complaint, Farah and Kassim jointly controlled the terms and conditions of Mr. Morrison's employment with VMT and GMR, including setting his working hours, rate of pay, and compensation.
12. At all times relevant to this complaint, VMT and GMR compensated Mr. Morrison on an hourly basis.
13. During the three years preceding the filing of this complaint, Mr. Morrison regularly worked more than forty hours per week for VMT and GMR, and frequently worked more than eighty hours in a workweek.
14. During the three years preceding the filing of this complaint, VMT and GMR failed to pay Mr. Morrison one and one-half times his regular hourly rate for all hours worked in excess of forty per week.

Based on the above facts, Plaintiff requests a jury trial on all triable issues and asks the Court for the following relief: unpaid overtime wages, liquidated damages as permitted by the FLSA, prejudgment interest, litigation costs, attorneys' fees, and other relief deemed appropriate by the Court.

Respectfully submitted on April 7, 2016.

s/ Regan Keebaugh
Regan Keebaugh
Georgia Bar No. 535500

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